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October 28, 2014

**VIA ECF**

Honorable Colleen McMahon  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: Rhoda, et al. v. Rhoda, Case No. 14-cv-6740 (CM) (RLE)

Dear Judge McMahon:

This firm is counsel to plaintiffs Hilary Rhoda ("H. Rhoda") and HRH Group, Inc. ("HRH") in the referenced action. I write with the knowledge and consent of defendant's counsel to respectfully request, jointly on behalf of all parties, that the Court grant an additional two weeks - - through and including November 14, 2014 - - for the parties to comply with Your Honor's directive, issued during the October 17, 2014 preliminary conference, to produce all relevant documents within the parties' possession by October 31, 2014, the deadline for initial disclosures under Fed. R. Civ. P. 26(a)(1) and Your Honor's Scheduling Order.

Since the preliminary conference, the parties have diligently undertaken the collection and review of thousands of pages of documents in an effort to comply with the Court's directive. In this regard, plaintiffs' counsel has obtained, and is in the process of reviewing, over 15,000 emails, as well voluminous additional documents concerning the parties' relationship and professional activities, and has formally requested documents from plaintiff H. Rhoda's current business manager, accountants and modeling agency, as well as her two former modeling agencies, former law firm and former public relations firm. In response to plaintiffs' initial requests, two of the entities that previously represented H. Rhoda have required that plaintiffs issue document subpoenas, which will be served by the end of this week.

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In addition, undersigned counsel has spoken with Dino Lombardi, counsel for the defendant, who advised that he and his firm are making every effort to identify, locate and produce all relevant documents and records in his client's possession as well as those in the possession, custody and control of various third parties, including banks, accountants, managers, agents, and attorneys who rendered services to the parties in this action. Toward that end, Mr. Lombardi has represented that he has written to and spoken with many of these individuals and entities in an effort to obtain production of such documents and records in an expeditious fashion.

In order to appropriately review and produce the voluminous materials collected from the parties, we respectfully make this joint request for a two-week extension - - through and including November 14, 2014 - - of the deadline imposed by Your Honor for the production of documents. In addition, counsel will continue to press third parties for expedited production of additional relevant documents and will review and exchange third-party documents promptly upon their production to us. The parties are not seeking an extension of the initial disclosure deadline under Fed. R. Civ. 26(a)(1), and will make the written disclosures required by that rule on or prior to the present deadline of October 31, 2014.

Thank you for your considered attention to these matters.

Respectfully,



John J. Rosenberg  
ROSENBERG & GIGER P.C.  
*Counsel for Plaintiff*

cc: Dino J. Lombardi, Esq. (via ECF & email)  
Matthew H. Giger, Esq. (via email)